

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JESSICA LYNN LARSON,

Defendant.

**AMENDED
INDICTMENT**

18 U.S.C. § 2244(a)(4)

18 U.S.C. § 1001

THE UNITED STATES GRAND JURY CHARGES:

COUNT 1

(Abusive Sexual Contact with a Ward)

1. At times relevant to this Indictment:

a. Federal Medical Center Rochester (“FMC Rochester”) was a federal medical center operated by the Bureau of Prisons and located in Rochester, Minnesota.

b. Defendant JESSICA LYNN LARSON was a nurse employed by the Federal Bureau of Prisons and assigned to FMC Rochester.

c. As a nurse assigned to FMC Rochester, LARSON’s duties and responsibilities involved the supervision, care, and correctional treatment of inmates.

d. Victim A was an inmate serving a federal prison sentence at FMC Rochester.

e. LARSON entered into a romantic relationship with Victim A while Victim A was incarcerated at FMC Rochester. During the course of this relationship, LARSON and Victim A exchanged sexually explicit letters.

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f. On April 3, 2024, LARSON and Victim A had a romantic sexual encounter in a shower room at FMC Rochester.

g. Shortly thereafter, other nursing staff reported LARSON's inappropriate relationship with Victim A.

h. FMC Rochester officials later found sexually explicit letters from LARSON hidden in Victim A's cell.

i. BOP officials then found sexually explicit letters from Victim A inside of LARSON's backpack.

j. After being confronted about her relationship with Victim A, LARSON submitted a BOP incident report in which she falsely accused Victim A of sexual assault and claimed that he had threatened to hurt her children if she refused his sexual advances or reported his assault.

k. Two months later, after being placed on administrative leave, LARSON drove more than 600 miles from her home in Iowa to Cincinnati, Ohio, to mail a love letter to Victim A who had been transferred to another BOP facility.

2. On or about April 3, 2024, in the State and District of Minnesota, and elsewhere, the defendant,

JESSICA LYNN LARSON,

while in FMC Rochester, a federal medical facility, knowingly engaged in sexual contact with Victim A, a person who was in official detention and under the custodial, supervisory, and disciplinary authority of the defendant, by touching Victim A's penis, while the defendant and Victim A were at FMC Rochester,

In violation of Title 18, United States Code, Section 2244(a)(4).

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COUNT 2
(False Statement)

3. The allegations of paragraph 1 are incorporated herein.

4. On April 26, 2024, in the State and District of Minnesota, the defendant

JESSICA LYNN LARSON,

willfully and knowingly made a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, to the Bureau of Prisons, that is to say:

a. LARSON filed a Bureau of Prisons incident report in which she falsely accused Victim A of “sexual assault by threat/force.”

b. LARSON claimed that on April 3, 2024, Victim A “asked me to look at something in the west shower room saying there was stuff coming off the ceiling” and that LARSON “stepped into the shower room . . . saw that there was plaster on the floor” and told Victim A that LARSON “couldn’t do anything about it but would report it to facilities.”

c. LARSON claimed that Victim A “then took his hand and pinned me to the wall” and that LARSON “told him to fucking let me go.”

d. LARSON claimed that Victim A “took his other hand and put it down my pants and touched me, putting his finger into my vagina” and then “took my hand and rubbed it on his pants over his penis.”

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e. LARSON claimed that Victim A told her that “if I turned him in, even if he got locked up, he would make sure my kids wouldn’t make it home today.”

In violation of Title 18, United States Code, Section 1001.

A TRUE BILL

ACTING UNITED STATES ATTORNEY

FOREPERSON